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9		
	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11	TOTAL DIGITAL	
12	KRISHNA D. BERNARD,	Civil No. 3:15-cv-1040-WHO
)
13	Plaintiff,	
14	vs.	STIPULATION TO EXTEND
1 [BRIEFING SCHEDULE
15	CAROLYN W. COLVIN,)
16	Acting Commissioner of	
17	Social Security,	
	Defendant.)
18		
19	IT IS HEREBY STIPULATED by the partie	s through their undersigned attorneys to extend
20	IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to extend	
20	Defendant's time to file her Motion for Summary Judgment by 30 days to September 14, 2015, and tha	
21		
22	all other scheduling dates set forth in the Court's Case Management Order shall be extended	
	accordingly. This is Defendant's first request for an extension of time in this matter. There is good	
23	There is good	
24	cause for this extension because counsel for Defendant is responsible for drafting various pleadings	
25	before the district courts within the Ninth Circuit and negotiating or litigating attorney fee matters	
	before the district courts within the Printin Circuit and negotiating of nugating attorney fee matters	
26	pursuant to the Equal Access to Justice Act. Additional time is also required because counsel for	
27		
28		
-	Stipulation to Extend Briefing Schedule, 3:15-cv-10	40-WHO 1
	I .	

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1	Defendant is responsible for conducting discovery and hearing preparation and drafting substantive	
2	motions in personnel-related litigation matters pending before the Equal Employment Opportunity	
3	Commission and the Merit Systems Protection Board.	
4	•	
5		
6		Respectfully submitted,
7	Date: <u>August 12, 2015</u>	SACKETT AND ASSOCIATES
8 9	Ву:	/s/ Asim H. Modi for Harvey P. Sackett HARVEY P. SACKETT
10		*Authorized by e-mail on August 12, 2015 Attorneys for Plaintiff
11	Date: <u>August 12, 2015</u>	MELINDA L. HAAG
12		United States Attorney DEBORAH LEE STACHEL
13		Acting Regional Chief Counsel, Region IX Social Security Administration
14	DV.	•
15	BY:	<u>/s/ Asim H, Modi</u> ASIM H. MODI
16		Special Assistant United States Attorney
17	ORDER	
18		
19	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
20		1.1. 1100
21	DATED: August 12, 2015	M-H.WE
22		HON. WILLIAM H. ORRICK
23		UNITED STATE DISTRICT JUDGE
24 25		
26		
27		
28		
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